REMARKS

Reconsideration and allowance of the subject patent application are respectfully requested.

The office action contends that claims 1-13 use mean-plus-function language and that the specification fails to set forth the exact structure, or equivalent thereof, that corresponds to the claimed function. Applicant traverses this contention. Nonetheless, to advance prosecution and simplify the issues in this application, Applicant has amended claims 1-13 so that the limitations thereof are not expressed in means-plus-function format.

Claims 1-3, 5-13, 23, 24, 26 and 27 were rejected under 35 U.S.C. Section 102(b) as allegedly being "anticipated" by Robotham et al. (U.S. Patent Publication No. 2002/0015042).

Applicant traverses this rejection.

Robotham et al. discloses a remote browser system using server-side rendering. As described in paragraph [0066]:

> In accordance with the invention, the server computer system 22 acts as a proxy client. This means that the server 22 performs most of the processing normally done by a client 24 in conventional client-side rendering except for painting the display surface 26 onto the client's bitmap display device. The server 22 allocates its own proxy display surface 28, and accesses and/or generates the constituent components 12a, …., 12n for the desired visual content element 10.

Paragraph [0069] further describes that "to minimize processing at the client side, the pixel transforms performed at the server 22 can optionally use the expected client display pixel resolution and aspect ratio as input parameters in order to generate display-ready data for the client."

The system of claim 1 includes a server-side symbol image data memory that stores symbol image data in correspondence with the resolution of an information display screen of a

mobile phone terminal. Based on resolution related information transmitted from the mobile phone terminal, the server transmits to the mobile phone terminal symbol image data selected from this memory. Robotham et al. is deficient at least with respect to these features.

In particular, server 22 of Robotham et al. does not include a symbol image data memory, nor is symbol image data is selected from such a memory in response to resolution related information transmitted from client 24. The office action suggests on page 5 that Robotham et al. discloses a server "with components capable of" the claimed functions. However, an assertion of "capability" does not constitute disclosure of the claimed features and consequently Robotham et al. cannot anticipate claim 1 or its dependent claims.

Independent claims 5, 6, 9, 12, 13 and 23 also involve a server-side symbol image data memory that stores symbol image data in correspondence with the resolution of an information display screen of a mobile phone terminal and from which symbol image data is selected in response to resolution-related information from a mobile phone terminal. For the reasons discussed above with respect to claim 1, Robotham et al. cannot anticipate these claims or the claims that depend therefrom.

The mobile phone terminal of claim 24 includes a transmitter for transmitting to a server a symbol image data request and display screen resolution information and a receiver for receiving symbol image data transmitted from the server in response to the request and the display screen resolution information. Robotham et al. does not disclose or suggest transmitting a symbol image data request to a server or receiving symbol image data from the server in response thereto. Pages 6 and 7 of the office action make reference to portions of Robotham et al. describing user interface actions taken by a user of client 24. However, these portions of Robotham et al. do not disclose the concept of a symbol image data request. For example,

paragraph [0073] mentions sending notifications of a user action to the server 22 for further

processing, but these notifications are not described as involving requests for symbol image data.

Consequently, Robotham et al. does not anticipate claim 24 or its dependent claims.

Claim 4 was rejected under 35 U.S.C. Section 103(a) as allegedly being made "obvious"

by a proposed combination of Robotham et al. and Pechatnikov et al.

As discussed in the prior response, the operations involving the set of templates described

in Pechatnikov et al. is clearly different than the symbol data transmission of claim 1.

Consequently, Pechatnikov et al. cannot remedy the deficiencies of Robotham et al. with respect

to claim 1, from which claim 4 depends. For at least this reason, claim 4 patentably distinguishes

from the proposed combination of Robotham et al. and Pechatnikov et al.

Claim 25 was rejected under 35 U.S.C. Section 103(a) as allegedly being made "obvious"

by a proposed combination of Robotham et al. and Kurumisawa et al. (U.S. Patent Publication

No. 2004/0080516). Kurumisawa et al. discloses a simple image display device in which, when

low resolution (120X160) image data is converted to high resolution (240X320) image data, a

number of pixels of original image data is multiplied by n and a number of gray scale levels is

multiplied by 1/n. Among other things, Kurumisawa et al. does not remedy the deficiencies of

Robotham et al. with respect to claim 24, from which claim 25 depends. Consequently, for at

least this reason, claim 25 patentably distinguishes from the proposed combination of Robotham

et al. and Kurumisawa et al.

The pending claims are believed to be allowable over the applied reference and favorable

office action is respectfully requested.

Respectfully submitted,

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